

Q and A Responses - Session 12: Housing – 8th March 2021

Session Questions / Matters Raised	Response
My questions relate to how windfall development is taken account of.	NPPF paragraph 70 indicates that it is reasonable to make an allowance for windfall sites as part of the anticipated future supply, as long as there is compelling evidence to do so and that any allowance is realistic. Based on historic windfall delivery rates and future trends the Council considers that it is reasonable to make a modest assumed contribution of 300 units per annum for years 3-18 for the plan-period. This is factored into the housing requirement in strategic Policy SP8: housing growth.
I am in Ilkley, we have ongoing development of new housing within the town boundary, such as large houses being knocked down and replaced with multiple small houses or flats. So I want to understand better how this is considered in the calculations of housing requirements for Ilkley or other similar communities in the district?	<p>The housing requirement effectively represents the net increase in homes to be planned for over the period covered by the Plan (2020 to 2038).</p> <p>If there are sites with currently known but unimplemented proposals for the replacement of single houses with multiple houses / flats and they are likely to be delivered within the plan period, the site will be allocated as long as the net increase in dwellings is above the threshold for inclusion in the plan (5 dwellings). In many cases such proposals will be smaller and will not be allocated and will be considered as windfall development. As indicated above the plan has included a windfall allowance at a district wide level to take account of such supply and this in turn reduces the amount of land releases accordingly.</p>
If we get more housing developed within the town boundary, could the allocation of greenfield sites for housing be reviewed at a later date? I.e. They are no longer required because we already added 300 homes within the existing boundary.	This depends on a range of factors including when the additional and currently unidentified supply materialises. The council will consider and assess any additional land supply within in preparing the next stage (Regulation 19) Draft Local Plan. However, the housing targets are not maximums they are minimums. Once the plan is adopted new supply from within settlements will be additional to the site allocations identified. The council has already included a windfall allowance for the District (see above) when setting the Housing requirement.
Councillors have told me that the housing target for an area is fixed, so that the rejection of one site must be compensated for by a new site in the same area. Can this be so, when the targets are based on land availability,	<p>The Council has existing settlement housing targets within the adopted Core Strategy which are fixed and which must be taken into account when planning applications are submitted and determined. The new and emerging plan is at an early stage in preparation and in line with Government guidance within the NPPF can be afforded little weight with regards to planning applications at this stage.</p> <p>However, the housing targets are being reviewed within the new Local Plan for the new plan period of 2020-2038 and clearly these are not fixed as they are subject to consultation along with all other aspects</p>

<p>so if one area is no longer available it affects everywhere?</p>	<p>of the plan such as specific proposed site allocations. Those targets could be amended when the plan is finalised at regulation 19.</p> <p>The housing targets proposed must reflect the scale and nature of land supply and site options both within the settlement and within other settlements. Should the evidence on land supply within a settlement change – for example as a result of current proposed sites being ruled out then the Council would need to look at options including bringing forward alternative sites within that settlement to compensate or reducing that settlement’s housing target and increasing targets elsewhere. However – logically – it is also the case that the target within a settlement could be increased should new sites within that settlement become available or options elsewhere in other settlements are ruled out.</p> <p>It should also be borne in mind that across the district sustainable and deliverable land supply is currently very tight and settlement targets and site allocations will need to reflect the plan’s objectives and spatial vision.</p>
<p>You are reliant on developers bringing forward or taking forward housing proposals. We know they will base their decision on commercial returns. Why target green belt sites allowing developers to drop less lucrative brownfield sites to pursue green belt sites you flag as potential options? You are handing developers control and threatening green field site in same action. How does this fit with the Councils and Government sustainability agenda? What will be released as part of the 'New Normal' - anticipated to see a reduction in physical footprint requirement of c30% (public and private sector), therefore freeing up assets for residential development / conversion</p>	<p>The Council has not ‘targeted’ green belt sites. It has assessed the available land supply and come up with a spatial strategy which places the overwhelming majority of development within the main urban areas and within settlements. It has assessed the scale and extent of and made maximum use of development opportunities in non-green belt locations. Moreover, it is wrong to suggest that sites in green belt locations cannot provide sustainable development.</p> <p>The Council has assessed taken account of the contribution which can be made from redevelopment sites and changes of use particularly within town and city centre locations. This is reflected both in the size of the housing target for the city centre which is 7,000 units (25% of the district wide total) and the allowance made for windfall development. It has also taken account of public sector property disposal programmes and is working with WYCA on the delivery of previously developed sites.</p>

(Bradford Council are part of the WYCA exercise developing the survey, which should provide a guide % in less than 18months)?	
Can you send ecology reports for each of the green belt sites you are targeting?	Any evidence reports will be made available as part of the plan preparation process. Further technical details on site assessment including ecology will be set out at the next plan preparation stage (Regulation 19) Draft Local plan,
What densities are we considering by location, and what mix of dwelling types?	See thematic policies HO2: Housing Density, HO3 Urban housing and HO4 Housing mix. Policy HO2 sets a minimum density of 35 dwellings per hectare (net). Increased to 50 dph in locations including town and district centres and in areas which are well served by high frequency public transport, locations in /or close to the City Centre and Principal Towns and locations close to railway stations should seek to achieve densities significantly in excess of 50 dph
Do you anticipate the building of houses matches with where jobs already are or are you expecting people to travel from their homes to work? Please can you explain how affordable housing will work in the Sun Lane site?	<p>The current Core Strategy Policy HO11 affordable housing required 30% affordable housing on major sites within Wharfedale.</p> <p>The level of housing and employment and housing land release reflects the evidence base and in particular the SHMA, the Housing Need Addendum Report, and Employment Needs Assessment.</p> <p>The Council and the Local Plan are committed to supporting economic growth and regeneration across the district and its recovery from the impacts of the pandemic. The Plan provides for at least 72ha of new employment land (Policy SP6), defines and protects enterprise zones, employment zones and Business Development Zones (Policy EC2) and supports area based regeneration proposals in the City Centre and Southern Gateway, the Shipley and Canal Road Corridor, in Shipley and in Keighley.</p> <p>The site assessment includes consideration of a site's accessibility to public transport/employment/services.</p>
What part of the process do Highways play - there are significant safety issues with some of the green field sites? Why flag green belt sites before ecology reports are done and assessed	All sites are being assessed with regards to the availability of a safe point of access and impacts on the highway network. More work will be done ahead of the finalised regulation 19 Plan in particular the use of transport modelling to assess wider highways impacts and possible mitigations and highway improvements.

<p>- this is also applicable to highways reports? What carbon release is anticipated from each green field site? Who assesses the ecology reports and who is doing the ecology reports?</p>	<p>The Council is taking into account both designated and undesignated ecological assets in preparing the local plan. Ecological surveys where required will be carried out this spring and results will be factored into the revised proposals. In line with NPPF All development (except householder applications) should deliver a measurable net gain in biodiversity value compared with the pre-development baseline. Policy EN2: Biodiversity and Geodiversity sets out development should attain biodiversity net gain, in the first instance onsite, through habitat retention, enhancement and creation.</p> <p>The plan proposes to align with the Government's future homes standards overall and on residential sites of 50 units or more zero net carbon. The specific 'carbon modelling' of developments has not been undertaken from this stage of the plan, but carbon assessment work is being considered as part of the transport modelling work programme.</p>
<p>Is there a minimum allocation of land per development for green space/parks etc</p>	<p>Open space – both formal and informal – is one element of green infrastructure which is essential to the creation of healthy communities. Policy SP10 sets out the Council overall approach to green infrastructure including the protection and improvement of the existing network of spaces and provide new spaces in growth areas and as part of new development. Policy CO1 sets out detailed policy approach which will be applied when considering planning applications. Emerging policy EN1 considers the application of Green Infrastructure Standards for new developments. Comments are welcome on this emerging policy area.</p>
<p>Per housing proposal is the figure for each development 24 dwellings before affordable needs to be incorporated?</p>	<p>No. The threshold is 10 units or more. (see policy Ho5 Affordable Housing)</p>
<p>As Bradford has declared a climate emergency I imagine we will be calling for zero carbon standards in the housing standards policy- otherwise we are just adding to our carbon emissions across the district.</p>	<p>The council have set out in policy HO9 Housing Standards that it will seek to achieve high construction and energy efficient standards in line with the Government's Future Homes Standard, and support and encourage new developments which exceed the minimum standards where possible, with all homes to be highly energy efficient, with low carbon heating and be zero carbon ready by 2025. This is in accordance with NPPF para 150 where any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.</p>

My main worry is brownfield sites being left to rot at the expense of greenfield and those released from the green belt and generally they are in our town centres which are in serious need of regeneration.	Comment noted. The plan identifies a range of brownfield sites across the district and regeneration priority areas where future investment including bringing back into use underutilised brownfield land will be focussed.
Climate emergency - whilst at the same time as building on green field site which in itself will release significant Carbon, can you explain how this works?	<p>The council have set out in policy HO9 Housing Standards that it will seek to achieve high construction and energy efficient standards in line with the Government's Future Homes Standard, and support and encourage new developments which exceed the minimum standards where possible, with all homes to be highly energy efficient, with low carbon heating and be zero carbon ready by 2025.</p> <p>Sustainable development as defined in national planning policy includes social, environmental and economic objectives. The council must balance meeting identified housing need by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth while considering the social and economic impacts. The scale and distribution of deliverable and developable land supply in the District has been assessed within the Strategic Land Assessment (SLA) – this indicates that to meet identified housing need the council will need to allocate some greenfield/greenbelt sites as there is insufficient brownfield sites to accommodate all the need.</p>
To what degree comments from highways and ecology have influenced site decisions and would these be available	The site assessment process has included consideration of a site's access and impact on ecology through internal engagement with colleagues in highways and ecology. Further work on both aspects will be undertaken ahead of the next plan preparation stage (Regulation 19) Draft Local plan,
There was a question on the Governments emerging changes on the planning system and whether we had made any decision on how the LP would respond and/or any decision on which areas would be deemed to be "growth", "regeneration" etc.	The Council is progressing the Local Plan under the present system in line with Government guidance. Preparation of a plan is considered essential to support the regeneration and economic growth of the district and to provide the homes and infrastructure necessary in a sustainable way. The Government's proposals for reform are yet to be finalised – the Council will assess and decide the best way to proceed once those proposals are finalised and in particular once any transition arrangements are published.
The strain on the green belt west of Leeds. Query what work had been done to assess the green belt and the	The existing green belt plays both a local and district role and a role at a more strategic level within the City Region. One of the key aspects of the site specific green belt assessments is to consider the potential for the merger of settlements and this is assessed irrespective of whether those settlements are within the district or adjoining local authority areas.

<p>potential coalescence of Bfd and Leeds.</p>	<p>There are no proposals within the local Plan which would result in coalescence with Leeds either in their own right or in combination with proposals within Leeds Local Plan.</p> <p>Moreover, the impacts of development on green belt and the potential for cross boundary impacts are among some of the key issues considered in discussions with adjoin Local Planning Authorities under the Duty to Co-operate, which is a very open process and subject to public scrutiny.</p>